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Attorneys for Plaintiffs Trustees
of the Hawaii Carpenters Trust Funds

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

HAWAII CARPENTERS TRUST) CIVIL NO. CV02-00425 JMS BMK
FUNDS, (Health & Welfare Fund)

by its trustees Albert) PLAINTIFF'S REPLY
Hamamoto, Audrey Hidano,) MEMORANDUM IN SUPPORT OF
Henry Iida, Glen Kaneshige,) ITS MOTION FOR ENTRY OF
Thomas Toma, Daniel Tom,) DEFAULT JUDGMENT AGAINST
Elmer Cabico, Paul C.K. Chang,) DEFENDANT DYNAMIC
Ronald Taketa, Melvin Fujii,) INTERIORS, INC., FILED ON
Clifford Resacio, Russell Young) MARCH 1, 2006; DECLARATION
and Keith Hirota;) OF LEANNE KUNIHISA; EXHIBIT
Apprenticeship & Training Fund) "A"; CERTIFICATE OF SERVICE

by its trustees James Ramirez,)
Russell Ogata, Conrad) Date: April 21, 2006
Murashige, Robert Donle,) Time: 2:30 p.m.
Angela Chinen, Dante Agra,) Judge: Barry M. Kurren
Ron Taketa, Sidney Shimokawa,)
Dean Takahashi and Russell) NO TRIAL DATE SET
Hiranaka; *Vacation & Holiday*)
Fund by its trustees James)

Watanabe, James Ramirez,)
Gerard Sakamoto, Paul Sasaki,)
Jiggs Tamashiro, Mark Erwin,)
Michael Spain, Jr., Rockwell)
Rogers, Jr., Curtis Kern, Patrick)
Borge, Sr. and Lloyd Kupau,)
Jr.; *Market Recovery Program* by)
its trustees Edmund Aczon,)
Thalia Choy, Steven Hidano,)
Claude Matsumoto, Gerard)
Sakamoto, Albert Belliveau,)
Michael Spain, Jr., Ronald)
Taketa, Glenn Young and Jason)
Orita; *Financial Security Fund*)
by its trustees Kenneth)
Sakurai, Gordon L. Scruton,)
James Watanabe, Conrad)
Murashige, Lance Wilhelm,)
Brian Hedge, Rockwell Rogers,)
Jr., Bruce Soileau, Ronald)
Taketa, Tim McCormack,)
Kenneth Spence, Jack Reeves)
and Ralph Yackley),)

Plaintiffs,)

vs.)

DYNAMIC INTERIORS, INC., a)
Hawaii corporation,)

Defendant.)

PLAINTIFF'S REPLY MEMORANDUM IN SUPPORT OF ITS MOTION
FOR ENTRY OF DEFAULT JUDGMENT AGAINST DEFENDANT
DYNAMIC INTERIORS, INC., FILED ON MARCH 1, 2006

Plaintiff HAWAII CARPENTERS TRUST FUNDS, by its trustees, et al. ("HCTF") by and through its attorneys, McCorriston Miller Mukai MacKinnon LLP, hereby respectfully submits its Reply Memorandum in Support of its Motion for Entry of Default Judgment Against Defendant Dynamic Interiors, Inc., filed on March 1, 2006 ("Reply Memo"), and in response to the arguments and statements made in Defendant Dynamic Interiors, Inc.'s ("Dynamic") Memorandum in Opposition ("Memo in Opp") filed on March 31, 2006.

Dynamic fails to inform the Court that it seeks relief, but has never filed an answer, thereby permitting HCTF to proceed as though all allegations in the Complaint have been admitted. As noted in the Complaint, HCTF would be seeking additional monies if, during the pendency of the action, HCTF determined following its audits that Dynamic owed additional monies.

HCTF, through its internal auditors, met with Dynamic on multiple occasions to clarify and determine the monies due and

owing based on the CBA. Dynamic has always claimed that HCTF did not properly credit their payments. HCTF has steadfastly denied these claims and further notes that it conducts numerous audits and only Dynamic has maintained this claim even when presented with evidence to the contrary.

Dynamic owes HCTF \$110,674.88. See, Declaration of Leanne Kunihisa and Exhibit "A," attached hereto. Accordingly, judgment should be awarded in favor of HCTF and against Dynamic in the amount of \$110,674.88 plus interest, with reasonable and necessarily incurred attorneys' fees in the amount of \$9,059.50, general excise tax of \$376.87 and costs of \$563.80.

DATED: Honolulu, Hawaii, April 10, 2006.

/s/ David J. Minkin

DAVID J. MINKIN

LISA W. CATALDO

Attorneys for Plaintiff

HAWAII CARPENTERS TRUST FUNDS